

**AFFIDAVIT IN SUPPORT OF**  
**CRIMINAL COMPLAINT**

I, Matthew Cromly being duly sworn, do hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent of the Federal Bureau of Investigation (FBI), and, as such, am an investigative or law enforcement officer of the United States within the meaning of Rule 41(a)(2)(C) of the Federal Rules of Criminal Procedure. Your affiant is engaged in the enforcement of criminal laws and is within a category of officers authorized by the Attorney General to request and execute arrest and search warrants pursuant to Title 18 U.S.C. §§ 3052 and 3107; and DOJ regulations set forth at Title 28 C.F.R. §§ 0.85 and 60.2(a).

2. Your affiant has been employed with the FBI since November 2002. I am currently assigned to the Cleveland Field Office, Toledo Resident Agency of the FBI. In this capacity, I am charged with investigating violations of federal criminal law, currently specifically those pertaining to violent crimes against children. Throughout my career I have performed a variety of investigative responsibilities, including functioning as a case agent on predominantly public corruption, international and domestic terrorism, and organized crime cases. I have received training in the conduct of crimes against children investigations. I also have received training and gained experience in interviewing and interrogation techniques, and the execution of federal search warrants and seizures.

3. The statements contained in this affidavit are based in part on information provided by federal law enforcement agents, written reports about this and other investigations that I have received, directly or indirectly, from other law enforcement agents, information gathered from the service of administrative subpoenas; the results of physical and electronic

surveillance conducted by law enforcement agents; independent investigation and analysis by law enforcement agents/analysts and computer forensic professionals, and my experience, training and background as a law enforcement officer.

4. I submit this affidavit in support of a Criminal Complaint charging Martin Lee WILCOXON with Coercion and Enticement, in violation of Title 18 U.S.C. §§ 2422(b) and Sexual Exploitation of minors, in violation of Title 18 U.S.C. §§ 2251(a). This affidavit is intended to show only that there is sufficient probable cause for a federal Complaint and does not set forth all of my knowledge about this investigation. The facts set forth in this affidavit are based on my own personal knowledge, knowledge obtained from other individuals during my participation in this investigation, including other law enforcement officers, a review of records related to this investigation, communications with others who have knowledge of the events and circumstances described herein, and information gained through my training and experience.

#### **STATEMENT OF PROBABLE CAUSE**

5. On June 10, 2022, FBI Cincinnati informed FBI Cleveland of an individual in Northwest Ohio who was in contact with the FBI Cincinnati Subject. The two were interacting via a social media application called KiK. Your affiant is aware that KiK is a freeware modern social media application, available for free on iOS and Android operating systems. It uses a smart phone's data plan or Wi-Fi to transmit and receive messages, photos, and/or videos. KiK has full user profiles, voice and video messaging, pictures, and gifs. Based on my training and experience, Affiant is aware that KiK is known to be used by child pornographers to receive and/or distribute child pornography.

6. During April 2022, the FBI Cincinnati Subject was a member of two Kik chat groups which also included a user with a KiK screenname of "workitgood08". On 04/13/2022, a

member in one of the Kik groups posted an image of a female in underwear. Kik user “workitgood08” typed **“Great....another girl with clothes on”**, followed by **“Just saying more nudity would be nice lol. This dressed shit I can see on the internet in magazines anytime lol 🙄”**. Also on 04/13/2022, in a second group chat, in response to the FBI Cincinnati subject discussing his alleged 5 and 8 year old step-daughters, “workitgood08” asked **“Got the 8 nude?”**. In regard to other group members discussing a 7-year-old, “workitgood08” replied **“Seen a vid of a girl that age actually taking a huge cock like a champ. Bulge in her stomach and the sound of each thrust were very clear.”**, **“Mhm. Hot as hell. Guy was definitely above average size and she took it all. You could literally hear the squish of each thrust and see the huge bulge pushing into her guts because it pressed her stomach skin out around it as he pushed back and forth inside her.”**, and **“And she took the loads too every time.”** When other group members asked if “workitgood08” still had the video and masturbated to it, “workitgood08” replied **“I did several times. And maybe....but not right on hand.”**

7. Subsequent investigation concluded that “workitgood08” is the KiK screenname utilized by MARTIN LEE WILCOXON (hereinafter “WILCOXON”), date of birth April 11, 1991.

8. FBI Cincinnati learned that FBI El Paso had an Online Covert Employee (hereinafter “OCE”) portraying the persona of a 13-year-old girl also on KiK. The OCE has been engaged in conversation with an individual with the KiK username “workitgood08” user since approximately February 2022.

9. Your affiant reviewed the chats between OCE and “workitgood08” (WILCOXON). During their chats, “workitgood08” (WILCOXON), requests the age, sex, and

location of the OCE. The OCE responds **“13f TX,u?”** “workitgood08” (WILCOXON) responds **“Nice. You care about age hun or are you cool with a lot older men?”** The OCE asks how much older and “workitgood08” (WILCOXON) responds **“30 M”**. “workitgood08” (WILCOXON) then tells the OCE he is from Ohio.

10. After engaging in conversation on KiK, the OCE and “workitgood08” (WILCOXON) then go to the social media application, Snapchat. Your affiant is aware that Snapchat is a free social media application in which users can send and receive photos. The photos delete after one to ten seconds. While utilizing Snapchat, WILCOXON sends at least two photos of himself to the OCE.

11. On June 14, 2022, your affiant reviewed the current Driver License/BMV photo of WILCOXON and compared this image to what was sent by “workitgood08” via Snapchat to the OCE. Your affiant believes it to be the same individual, MARTIN WILCOXON.

12. Your affiant further reviewed the chats between the OCE and “workitgood08” (WILCOXON). During several of the chats, “workitgood08” (WILCOXON) states he wants to travel to meet with the OCE to engage in sexual acts. They have discussed setting up a meeting multiple times. Below is an example:

13. **-On 4/28/2022 12:06:24 p.m. (UTC-6) and following:**

**Workitgood08: Perhaps you can get your parents to actually do a vacation up and around Tennessee later in June.**

**OCE: lol I'll see what r summer plans r**

**Workitgood08: I'll have to double-check exactly where....but I had a vacation deal thing I picked up a while ago that I had to set for around then. Right at the end of June.**

**OCE: In Tennessee?**

**Workitgood08:** Yea, if u remember right.

**Workitgood08:** \*If I

**OCE:** ok well let me know

**Workitgood08:** Think you can convince them to do some vacation?

**OCE:** I'll try

**Workitgood08:** Think they'll wonder if you randomly disappear at the place?

**OCE:** Not sure we'd have to come up with a good plan

**Workitgood08:** any chance you could get them to bring you and Layla both since you're friends? Could get you another room with you and her that way. Easier to sneak out of of course if you can or even if alone, I could just happen to run into you with them around and "recognize" you from a school event there. For all they know, I'm your other friend's cousin or something that was introduced to you at some sports thing or something you went to

**OCE:** Layla is always allowed to come with us. Shes like family. I toled them I wanted to go to Knoxville or Nashville for vacay

**workitgood08:** Perfect on the first part. And I tracked down the email. It's over near the Dollywood place southeast of Knoxville just a little ways. It's a shame I don't have my other car fixed up though. All I'd have to do is dress nicer and they'd assume I'm a cop or something just from the clothes and the car

14. Your affiant reviewed chats most recently in June, in which WILCOXON again expresses his desire to meet with the OCE to have sex with her. Below is an example:

**-On 6/4/2022 7:22:33 PM(UTC-6)**

**workitgood08:** Hun.....tell me.....where can you get to for any trip that's towards this way if possible? And are you sure you can get away from your parents and such long enough to have time to enjoy everything together?

**I do want you to be able to enjoy what we do. Not have to rush it too much your first time.**

**OCE:** I can probably get away for a few hours at least.

workitgood08: Like I really want you to be able to feel the slow firm sliding of it inside you with the warmth and feel my heartbeat pulsing through my cock and everything with each thrust to make you feel amazing 😊

OCE: I can go back to Chicago

workitgood08: I could try to figure Chicago. Might just have to see about a run there with the work truck and take a day or so.  
Are we decided that we are using condoms in your pussy though just to be careful for now at least? Or do you absolutely want it in there without one?

OCE: Or Detroit maybe 🧑

workitgood08: I mean til later in the future, not forever with them.  
And wait.....you could get to Detroit?

OCE: Yeah I think so.....how far is that from u  
I have a cousin there

workitgood08: Like 2-3hrs.....at best.

OCE: That's not too bad at all

workitgood08: That's actually a lot better than Chicago would be honestly.

OCE: Chicago would be the easiest but I could ask to go to Detroit  
What big city is closest to u

workitgood08: If it means us actually getting time together, the Detroit one would definitely be closest of the 2.  
Unless you could manage Toledo somehow.

OCE: Toledo? What's in Toledo?

workitgood08: Same shit as a lot of cities, morons and moaning 😏

OCE: Hahaha I have to find a reason to go there

workitgood08: Well, more pleasant moaning with us there, but still 😏

Ya didn't answer the other question though btw

OCE: What question

**workitgood08: About if we intend to use any condoms in your pussy for now beyond taking your virginity.....or if we plan to take the full risk now. Versus waiting a few years to start going bare skin in that hole since I wouldn't be pulling out.**

**OCE: It's up to u**

**workitgood08: I mean.....we can get like one of the morning after pills of course. But just so we are on the same page.....those do have a chance to not work. Low chance, but possible.**

**OCE: What would we do if u got me pregnant  
I just want to have fun to start**

**workitgood08: Well, your parents could destroy my life and call the cops if they reacted and found out I got you pregnant at this age.**

15. Through review of the chat's your affiant is aware that "Layla" is a fictitious 14-year-old "friend" of the OCE. During several of the chats, WILCOXON expresses his desire to also have sex with "Layla" as well.

16. WILCOXON and OCE, engage in several further discussions regarding sexual acts. WILCOXON repeatedly tells OCE all the sexual acts he would like to do to her, including taking her virginity. He even discusses purchasing the "morning after pill" for the OCE so they can have unprotected sex.

**-05/02/2022 at 9:53:51 p.m. (UTC-6) and following:**

**workitgood08: Hun, I asked if you had thought about preference. If you're too nervous about me cumming inside you or worried, I can use them with you for now. If you're not worried or if you want to feel me cum inside you, then I need to know that. But I would like to know your thoughts.**

**Same for Layla too.**

**OCE: I just don't know my preference yet. Ull have to be the lead on pretty much everthing.**

**workitgood08: Fair enough. If I cum inside you at all though.....we'll have to get you one of the morning after pills to take. Do you know if Layla is on any birth control? I don't remember if I asked about her already for that.**

- 05/05/2022 at 1:56:08 p.m. (UTC-6) and following:

**workitgood08:** “Haha because you can enjoy the feeling of being stretched by my cock?”

**OCE:** “I’m definitely interested in that”....”I hope I like it”

**workitgood08:** “Hmm...what if it feels awkward? Gonna back off from sex a bit then.....or beg me to do it harder?” ... ”I mean it would be new for you and I’ll literally be inside your body” ... “I’m definitely looking forward to us actually getting to fuck hun. Wish we could run and not have to wait, but we’ll just have to soon as we can. Hopefully Layla can join you and you both can enjoy the cock”

- 06/10/2022 at 8:08:26 a.m. (UTC-6) and following:

**workitgood08:** “oh....random byw. If youre naked and I tell you to sit on my face.....do you have an idea what I mean to do? Im curious if you know at all”

**OCE:** “lol no I don’t. Like literally sit on u”

**workitgood08:** Yep for like likcing your pussy or your ass kinda stuff. The stuff that would be called eating you out”

**OCE:** Oh well how do you breathe???

**Workitgood08:**” Haha I screeshotted a couple things from a vid or 2 that might help lol”

\*Workitgood08 then sent six photos of sexually explicit conduct to the OCE. Although ages of the females are unknown, one of the images contained a naked female who you’re your affiant opines could be a teenager.

**Workitgood08:** “So basically like this, but me laying with my head under your butt. You can just enjoy it thatway or suck my cock while I’m licking your pussy or ass that way hun”

17. Your affiant reviewed several chats between OCE and Workitgood08 during which Workitgood08 tried to get OCE to send him naked photos of herself. Below is a sample of the chats:



**- 5/3/2022 10:09:51 PM(UTC-6)**

**Workitgood08: So tell me hun.....are we going to have any issue with you sending me anything of you girls naked anymore either? Or gonna do that for me?**

**- 06/10/2022 at 5:08:47 p.m. (UTC-6) and following:**

**Workitgood08: “Ya know.....that would be a great time to video call me so I can watch you all naked and wet in the shower Hun”**

**-06/10/2022 at 7:14:26 p.m. (UTC-6)  
OCE: We can try to make it happen”**

**Workitgood08: “Sure hope so. Even if it's just a short one. At least shower time is a time you could strip down for me too”**

**Workitgood08: “That is something you want to do, right hun?”**

18. On June 10, 2022, Charter Communications sent FBI El Paso results for a subpoena regarding the IP address associated with the KiK account. According to Charter Communications, the Subscriber name is Martin Wilcoxon with a service address of 342 East Street, Defiance, Ohio 43512-2272.

19. Your affiant has been advised that consistent with the Charter subpoena results, on April 8, 2022, around 10pm El Paso time (4am April 9, 2022, UTC) WILCOXON chatted with the OCE, specifically during one of the chats, he told the OCE that he wanted to impregnate her. The OCE conveyed that according to the subpoena return from Charter Communications that at the time of this chat, WILCOXON was utilizing home wifi associated with the residence at 324 East Street, Defiance, Ohio 43512 on April 9, 2022, at 3:47am, which was registered to his name.

20. Your affiant reviewed a local police report from March of 2021 wherein WILCOXON discussed his vehicle parked adjacent to 324 East Street, Defiance, Ohio. In this report, he informed the officer that he is renting this property for his primary residence.

21. A review of WILCOXON's criminal history revealed an arrest in Nebraska on April 15, 2015, for Carrying a Concealed Weapon, which resulted in a Misdemeanor Conviction on July 15, 2015. He was also charged with minor firearms offenses in Ohio and Illinois which did not result in convictions.

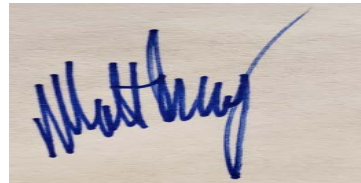
22. Your affiant also reviewed a police report from the Defiance Ohio Police Department from December of 2021. According to the report, an 11-year-old female with the initials "B.S." informed the Defiance Police that approximately during the summer of 2021 she stayed overnight at the residence of WILCOXON at 324 East Street, Defiance, Ohio. She advised that she lives near WILCOXON and he allows her to play video games at his residence. On the evening in question, she recalls handing him the video game controller around midnight and falling asleep on his couch. At some point, "B.S." awoke to the feeling of "air touching her buttocks" with WILCOXON sitting next to her on the couch. The child said she fell back asleep and told the police that she "didn't know" if WILCOXON touched her. However, prior to this interview, a nine (9) year old female told her mother, who reported it to the mother of "B.S.", who then reported it to the police, that "B.S." told her that when "B.S." felt the air touch her buttocks, that she "felt a finger on her going down her pants and on her butt."

23. On 06/16/2022, WILCOXON was arrested by FBI Cleveland during the execution of a federal search warrant at his residence at 324 East Street Defiance, Ohio 43512. WILCOXON was transported the Defiance County Sheriff's Office, where he was advised of Miranda rights and agreed to talk to investigators. During the interview, WILCOXON made

statements indicating that he had been in contact with the OCE in Texas. WILCOXON further made statements indicating he had massaged the buttocks area and “incidentally may have” touched the vaginal area of “B.S.”, the 11-year-old female neighbor, WILCOXON further advised among other admissions, that he had pressed his erect penis against “B.S.”, through his clothing, and showed “B.S” pornography.

### CONCLUSION

24. Based on the foregoing, I have probable cause to charge Martin L. WILCOXON, born April 11, 1991, with Coercion and Enticement, in violation of Title 18 U.S.C. §§ 2422(b) and Sexual Exploitation of minors, in violation of Title 18 U.S.C. §§ 2251(a).



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Matthew Cromly  
Special Agent, FBI

Sworn to via telephone on this 17<sup>th</sup> day of  
June 2022 after submission by reliable  
electronic means. Fed.R.Crim.P. 4.1 and 41(d)(3).



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DARRELL A. CLAY  
UNITED STATES MAGISTRATE JUDGE